

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**Case No.:09-06437-ESL**

**CARLOS L BELTRAN RODRIGUEZ  
INES GONZALEZ ROSADO**

**Chapter 11**

**Debtors.**

\_\_\_\_\_ /

**APPLICATION FOR LEAVE TO RETAIN REALTOR**

TO THE HONORABLE COURT:

NOREEN WISCOVITCH RENTAS, duly appointed Chapter 11 Operating Trustee in this case ("Trustee"), states and request relief as follows:

1. The Trustee seeks to employ, MIGUEL RAMOS RIVAS owner and President of **National Executive Real Estate** to procure the sale of real property pertaining to the Estate and other related corporations. There are multiple properties owned by the Debtors, including realties which belong to other related corporations.
2. Miguel Ramos Rivas procured the sale of a realty related company CBR Properties, Corp. The sale is pending closing. The rate of commission in that particular sale is 5%. Per the Contract, the fees will be split between Ramos and the buyer realtor as it is customarily among realtors in which one brings the buyer and the other is the realtor for the seller.
3. **National Executive Real Estate** will be responsible of all selling and marketing efforts and will conduct the sale of the property in accordance to the notice of sale to be filed and noticed to creditors and parties in interest on even date.

4. To the best of the Trustee's knowledge, the firm and the professional whose employment is sought has no connection with the Trustee, the Debtor, the creditors, any parties in interest, their respective attorneys or accountants, the office of the US Trustee or any person employed by said office. Except that the realtor was contacted by the Debtors to represent them in the sale of a realty pertaining to an affiliated corporation CBR Properties, Corp.
5. The Trustee further believes that in the discharge of her duties the firm and its representative will not hold any interest adverse to the herein Estate and will be a disinterested person as defined by 11 U.S.C. §§101(14), 327.
6. The proposed realtor will be paid for its services as follows: In the event of a sale procured by **National Executive Real Estate**, in compliance with the terms, conditions, and minimum price detailed a the notice of sale, **National Executive Real Estate** will receive a commission at the rate of 2-5% of the gross sales price. These commissions are to be paid by the Estate, after notice and hearing and allowance by the Court.

**WHEREFORE**, the Trustee, Noreen Wiscovitch Rentas, respectfully requests an order authorizing the Trustee to retain the services of MIGUEL A. RAMOS RIVAS and **National Executive Real Estate**, to act as Realtor for the Trustee in the sale of various realties property of the Estate or property of an affiliated corporation and for any further relief this Court deems just and proper under the circumstances.

#### **NOTICE TO ALL CREDITORS AND PARTIES IN INTEREST**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Federal Rule of Bankruptcy Procedure 9006(f) if you were served by mail, any interested party whom against this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed

within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by Law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed by US Mail to all creditors and interested parties on the attached list on this 31<sup>st</sup> day of March, 2011.

/s/Noreen Wiscovitch-Rentas  
**NOREEN WISCOVITCH RENTAS**  
CHAPTER 11 TRUSTEE  
PMB 136  
400 Calle Kalaf  
San Juan, Puerto Rico 00918  
Tel: (787) 946-0132  
Fax: (787) 946-0133  
noreen@nwr-law.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**Case No.:09-06437-ESL**

**CARLOS L BELTRAN RODRIGUEZ  
INES GONZALEZ ROSADO**

**Chapter 11**

**Debtors.**

\_\_\_\_\_ /

**VERIFIED STATEMENT PURSUANT TO LOCAL RULE 2014**

I, Miguel A Ramos Rivas d/b/a President of National Executive Real Estate, respectfully, states:

1. I am duly licensed to conduct business in Puerto Rico. My realtor license number is 5113.
2. I maintain offices in Urb. Villa Graciela, Domingo Fidalgo Avenue, A-6, Juncos, PR 00777. Telephone numbers: (787) 734-6060 and Fax (787) 713-0120.
3. I am a disinterested person pursuant to 11 U.S.C. §101(14). Neither National Executive Real Estate, nor myself, nor my employees, have any prior connection with the Trustee, the Debtor, creditors, any other party in interest their respective attorneys and accountants, and the US Trustee Office. Except that prior to filing this application I entered into a contract for the sale of a realty owned by CBR Properties, Corp. I have not sold any other realty for the Debtors in this case.
4. I know of no reason why I cannot faithfully discharge its duties as Realtor for the Estate and should not be considered disinterested party within the meaning of 11 U.S.C. §101(14) and §327 of the Bankruptcy Code. I do not hold or represent an interest adverse to the Estate. There is an agreement with a Third Party to share the fees in connection with the sale of the realty owned by CBR Properties. The fee sharing agreement is shown in the

contract for purchase of the Realty. An application for compensation will be prepared and filed pursuant to Fed.R.Bank.P. 2016.

5. I understand that I shall be paid for the services performed from the proceeds of any sale which the buyer is procured through my service, at a rate described in the Application for Leave to Retain Realtor, upon approval of the Court.

6. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto.

7. I have reviewed the provisions of LBR 2016-1.

#### DECLARATION

I, Miguel A Ramos Rivas, declare under penalty of perjury that the above document has been drafted in accordance with my instructions and that the statement made are true and correct to the best of my knowledge, information and belief.

In San Juan, Puerto Rico, this 31<sup>st</sup> day of March, 2011.



MIGUEL A RAMOS RIVAS

## **CURRICULUM VITAE**

### **PRESIDENT:**

Miguel A. Ramos Rivas  
Lic. 5113

### **ESTABLISHED:**

June 6, 1992

### **MOTTO:**

"More than a client, a friend ..."

### **MISSION:**

Represent and protect the interests of those seeking our services with honesty and professionalism. Promoting excellence in service and confidentiality as well as an effective marketing benefit and satisfaction of all parties as more than clients, we want to become friends.

### **SERVICES:**

We offer an excellent service in buying, selling and marketing their properties. Our greatest commitment is to satisfy the needs of our customers. We are distinguished by the cordial and respectful care we provide.

Work and qualify prospective customers with various financing programs:

FHA  
Conventional  
Act 124  
Program Home  
203 K  
Ley 121  
Housing Bank  
FmHA L + V 100%  
Project Development Consultancy, Residential, Commercial and  
Industrial

## **TEAM MATES:**

Yelitza Santana Rodríguez  
Administrative Assistant

Nermin Ramos Reyes  
Assistant

José Félix Falero Rijos  
Real Estate Broker  
Lic. Number 11583

José L. Ríos Meléndez  
Real Estate Broker  
Lic. 11097

Arnaldo R. Hernández Rosa  
Real Estate Broker  
Lic. 10775

Carmen M. Rivera Aponte  
Real Estate Broker  
Lic. 1990

Marisol Pabón González  
Real Estate Broker  
Lic. 13606

Joaquín Torres Guadalupe  
Real Estate Broker  
Lic. 12522

Wanda J. Vázquez Brito  
Real Estate Broker  
Lic. 12974

Antonio Aponte Sánchez  
Real Estate Broker  
Lic. 15477

Rafael J. Uceta Grullón  
Real Estate Broker  
Lic. 14056

Luanna L. Santos Isales  
Real Estate Broker  
Lic. 16053

Isis Reyes Carrasquillo  
Real Estate Broker  
Lic. 2355

Israel Avilés Ramos  
Real Estate Broker  
Lic. 7380

Jowilliam Calo Passalacqua  
Real Estate Broker  
Lic. 15035

## **RESIDENTIAL PROJECTS ACHIEVED:**

Urbanización Colinas de Juncos  
Gurabo Arriba Ward, Juncos, Puerto Rico  
Sales and marketing 60 residences

Urbanización Rancho Bonito  
Ceiba Norte Ward, Juncos, Puerto Rico  
Sales and marketing 72 residences  
FmHA

Urbanización Extension Reparto Valenciano  
Mamey Ward, Juncos, Puerto Rico  
Sales and marketing 24 homes  
FmHA

Urbanización Lirios Cala I  
Lirios Ward, Juncos, Puerto Rico  
Sales and marketing 300 residences  
FmHA, FHA

Urbanization Lirios Cala II  
Lirios Ward, Juncos, Puerto Rico  
Sales and marketing of 252 units  
FmHA, FHA

Urbanización Estancias de Juncos  
Sales and marketing of 252 units  
FmHA, FHA

Urbanización Hacienda Grande  
Naguabo, Puerto Rico  
Management and Consulting

Urbanización Extension O'Neill  
Manatí, Puerto Rico  
Sales and Marketing

Jesús María Sanromá  
Carolina, Puerto Rico  
Sales and Marketing  
Social Interest Project



## **COMMERCIAL PROJECTS ACHIEVED:**

Colegio Corazón de María, Inc.  
Consulting permits, financing and Inspection  
Ceiba Norte Ward, Juncos, Puerto Rico

Juncos Plaza Shopping Center  
Permitology Consultancy, Financing and Sale  
Ceiba Norte Ward, Juncos, Puerto Rico

Praderas del Río (Today Amgen)  
Administration Permitology consulting, financing and sale  
Ceiba Norte Ward, Juncos, Puerto Rico

Plaza Paseo de Tena  
Administration Permitology consulting, financing and sale  
Ceiba Norte Ward, Juncos, Puerto Rico

La Coroza Industrial Park  
Administration Permitology Consulting, Financing and Sale  
Ceiba Norte Ward, Juncos, Puerto Rico

Naguabo Food Court  
Administration Permitology Consulting, Financing and Sale  
Mariana Ward, Naguabo, Puerto Rico

Oriental Sand and Gravel  
Permitology Advisor, Industrial and Sales Consultancy  
Aguaicate Ward, Yabucoa, Puerto Rico

South East Manufacturing  
Industrial and Manufacturing Project Arena  
Yabucoa, PR

Walmart Supercenter  
Consulting and Sale  
Hatillo, PR

Walgreens  
Consulting and Sale  
Las Piedras, PR

Areneras BM  
Consulting and Sale  
San Lorenzo, PR

JF & Asociados  
Proyecto de Manufactura de Arena  
Consulting and Sale  
Juncos, PR

## **PROJECTS CONTRACTED TO BE HELD AND SALE PROCESS:**

Palma Real Jobos (Walk Up)  
Sales and Marketing 42 apartments  
Bajuras Ward, Isabela, Puerto Rico

Proyecto Vistas de Florida  
Ley 124  
Sales & Marketing, 24 apartments  
Florida Ward, San Lorenzo, Puerto Rico

Condominio San Francisco  
Sales and marketing 40 apartments  
Ley 124  
Gurabo Arriba Ward, Juncos, Puerto Rico

Proyecto Florida Hills  
Sales and marketing of 37 homes  
Florida Ward, San Lorenzo, Puerto Rico

Plaza Punta San Juan (Commercial Project)  
Road 3 Intersection 985  
Quebrada Ward, Fajardo, Puerto Rico

Urb. Estancias de Andalucía  
Ley 124  
Consulting, Sales and Marketing of 176 Units  
Lirios Ward, Juncos, PR

Condominio Avalon  
Sales & Marketing, 18 Units  
Río Piedras, PR

Urb. Laderas de Las Piedras  
Consulting, Sales and Marketing / Act 124  
Las Piedras, PR

Alturas de Lirios Cala  
34 Units, FHA, FmHA  
Juncos, PR

Haciendas de Yabucoa  
263 units, FHA, FmHA  
Yabucoa, PR

Laderas de Humacao  
Consulting  
Humacao, PR

Monte Brisas  
Consulting  
Fajardo, PR

## **JOB EXPERIENCE**

### **National Executive Real Estate**

Tasks: As President, I carry out all functions of the general administration of my office such as supervising brokers, vendors and Administrative Assistant in the business of Real Estate, offering the best customer service to our commercial, industrial, agricultural, agro-industrial and residential, complying with the Laws of Puerto Rico, under the Code of Ethics of the Board of Realtors.

### **Plus Realty**

Tasks: Real Estate Broker, listing residential properties for sale or selling properties in the portfolio, processes all documentation for the financing and help customers to complete transactions in real estate.

### **Distribuidora Vázquez**

Tasks: Sell staples to different businesses and develop new routes in the area east of Puerto Rico.

### **AL Williams Ins. Serv.**

Task: Starting as an insurance salesman, reaching the position of Vice President, where he recruited and trained staff in the area of life and disability insurance. Manage and supervise its own office to 47 people teams in different regions of the island

### **Universidad del Turabo**

Role: Assistant Director of Security - security administrative tasks in providing services to students, such as traffic regulations on campus, tuition and social activities.

### **Colmado Ramos**

Tasks: Manage, buy merchandise for the business, accounts receivable, assist customers to offer the best services.

## **RELATED CONTRIBUTIONS**

### **Management Advisory Board**

Colegio Corazón de María, Juncos, Puerto Rico  
1994-2002

### **The advisor to the Board of Community Land Management Plan of the Municipality of Juncos**

2000

### **Vice President of Veterinary Medicine Institute**

2003-2004

### **Vice President of National Large And Small Animal Shelter Home, Inc.**

2003

### **An adviser to the Diocese of Caguas**

2001-2003

### **Secretary of the Management Board**

Liga de Baloncesto Infantil de Juncos, Puerto Rico  
1997-1999

## **SEMINARS AND EDUCATION**

- Tax Reform
- Sale of Business in Motion, Certified Public Accountants Association of Puerto Rico.
- 203-K-Financing
- Legal and New Projects
- Financing
- Introduction to Internet
- Pricing Analysis
- Loans-Internet Technology
- Real Estate Contracts
- Financing 100% Federal Grant 502 and 504
- The Market for New Projects (Marketing Properties)
- Mortgage-Technology through the Internet
- Evaluation of Properties and Interpretation of the Taxation
- Land Registry
- Marketing and Publicity Via Internet and MLS
- Bankruptcy Law
- Sales and Self Motivation Techniques
- Act 124
- Ley 121
- Home Program
- Project Management
- Technical Cost Estimates
- Analysis and Evaluation
- Economic Viability of a Project
- Microsoft Project I and II

Label Matrix for local noticing  
0104-3  
Case 09-06437-ESL11  
District of Puerto Rico  
Old San Juan  
Thu Mar 31 12:44:09 AST 2011

FIRSTBANK PUERTO RICO  
ENR & ASSOCIATES  
PO BOX 191017  
SAN JUAN, PR 00919-1017

ORIENTAL BANK & TRUST as successor in intere  
PO BOX 11750  
FERNANDEZ JUNCOS STATION  
SAN JUAN, PR 00910-2850

TORAL PETROLEUM CORPORATION  
O'Neill & Gilmore, PSC  
Citibank Towers Suite 1701  
252 Ponce de Leon Ave.  
San Juan, PR 00918-2001

UNITED STATES OF AMERICA  
US DEPT OF JUSTICE TAX DIVISION  
PO BOX 227 BEN FRANKLIN STATION  
WASHINGTON, DC 20044-0227

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BANCO POPULAR PUERTO RICO  
POPULAR CENTER  
209 AVE MUNOZ RIVERA  
SAN JUAN, PR 00918-9948

CARLOS BELTRAN GONZALEZ  
SUNRISE AT PALMAS  
95 MORNING DEW  
HUMACAO, PR 00791-6316

Crim  
P.O. Box 195387  
San Juan, PR 00919-5387

EBP DESIGN GROUP CONSULTING ENGINEERS PSC  
207 DEL PARQUE ST  
4TH FLOOR  
SAN JUAN PR 00912-3237

BANCO POPULAR DE PUERTO RICO  
PO BOX 362708  
SAN JUAN, PR 00936-2708

JUNCOS SERVICE STATION  
39 PORT ROAD  
LAS PALMAS  
HUMACAO, PR 00791-6052

POPULAR AUTO  
YASMIN R VAZQUEZ ESQ  
PO BOX 366818  
SAN JUAN, PR 00936-6818

TOTAL PETROLEUM PUERTO RICO CORP  
PO BOX 362916  
SAN JUAN, PR 00936-2916

US TRUSTEE  
EDIFICIO OCHOA  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

ARCH CHARLES DE JESUS  
PO BOX 29325 65 INF STATION  
SAN JUAN PR 00929-0325

Best Petroleum Inc.  
P.O. Box 9525  
Bayamon, PR 00960-9525

Carlos Beltran  
Port Road # 39  
Humacao, PR 00791-6052

DEPARTAMENTO DE HACIENDA PR  
P.O. BOX 9024141  
SAN JUAN, PR 00902-4141

EFRAIN CASILLAS  
P.O. BOX 775  
JUNCOS, PR 00777-0775

Chevron Puerto Rico, LLC  
William Estrella Law Offices  
PO Box 9023596  
Old San Juan, PR 00902-3596

LAS PIEDRAS SERVICE STATION  
39 PORT ROAD  
LAS PALMAS  
HUMACAO, PR 00791-6052

STATE INSURANCE FUND CORP  
ALEJANDRO A SUAREZ CABRERA ESQ  
PO BOX 365028  
SAN JUAN, PR 00936-5028

TREASURY DEPT/DEPT JUSTICE PR  
YANINA RUFAT GARCIA ESQ  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

WESTERNBANK PUERTO RICO  
JESUS R RABELL MENDEZ ESQ  
PO BOX 195580  
SAN JUAN, PR 00919-5580

BANCO POPULAR DE PUERTO RICO  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PR 00936-6818

Bitafull Inc.  
PMB 1778  
San Juan, PR 00917-3132

Carlos Beltran Rodriguez  
Palmas Del Mar  
Port Road #39  
Humacao, PR 00791-6052

DEPARTAMENTO DE HACIENDA PR  
Sec. De Quiebras Ofic. 424-B  
P.O. Box 9024140  
SAN JUAN, PR 00902-4140

EURO BANK  
270 AVE MUNOZ RIVERA  
SAN JUAN, PR 00918-1901

FIRST BANK  
AVE MUNOZ RIVERA # 876  
HYDE PARK, RIO PIEDRAS, PR 00927-4307

FIRSTBANK PUERTO RICO  
ENRIQUE NASSAR RIZEK & ASSOCIATES  
PO BOX 191017  
SAN JUAN PR 00919-1017

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Interal Revenue Service  
Ciiti View Plaza #2  
48 Carr 165 Suite 2000  
Guaynabo, PR 00968-8000

JC PENNEY  
PO BOX 960090  
ORLANDO, FL 32896-0090

Juncos Service Stattion  
Carr. 185 Kl. 20.0  
Juncos, PR 00777

KELVIN HERNANDEZ  
SUNRISE AT PALMAS  
90 SHADOW MIST  
HUMACAO, PR 00791-6306

Las Piedras Service Station  
Carr. 183 Kil. 20.7  
Las Piedras, PR 00771

OC ENGINEERING GROUP PSC  
URB SANTIAGO IGLEISIAS  
1344 CALLE ESTEBAN ORTIZ  
SAN JUAN PR 00921-4105

POPULAR AUTO  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PUERTO RICO 00936-6818

POPULAR AUTO (POPULAR LEASING)  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PUERTO RICO 00936-6818

Puerto Rico Department of Labor  
Collection Unit - 12th Floor  
505 Muoz Rivera Ave  
San Juan PR 00918-3352

Ramon Lebron Ocasio  
HC40 Box 47250  
San Lorenzo, PR 00754-9907

SEARS CREDIT  
PO BOX 183081  
COLUMBUS OH 43218-3081

STATE INSURANCE FUND CORPORATION  
PO BOX 365028  
SAN JUAN, PR 00936-5028

TORAL PETROLEUM CORP  
KM 8 3 Rr 2  
Bayamon, PR 00961-3507

Total Petroleum Corporation  
PO Box 9335  
Bayamon, Pr 00960-9335

Total Petroleum Puerto Rico Corp.  
c/o Jorge A. Cartaya  
P.O. Box 9023557  
San Juan, P.R. 00902-3557

Treasury Departmenty Of Puerto Rico  
Federal Litigation Div, Dept. Of Justice  
P.O. Box 9020192  
San Juan, PR 00902-0192

Visa  
P.O. Box 70100  
San Juan, PR 00936-8100

WESTERN BANK/BANCO POPULAR  
269 AVE PONCE DE LEON  
SAN JUAN, PR 00917-1918

WESTERNBANK  
270 AVE MUNOZ RIVERA  
SAN JUAN, PR 00918-1901

WESTERNBANK/BANCO POPULAR DE PUERTO RICO  
PO BOX 1450  
MAYAGUEZ, PR 00681-1450

CARLOS L BELTRAN RODRIGUEZ  
PO BOX 775  
JUNCOS, PR 00777-0775

ENRIQUE J SILVA ALMEYDA  
PMB 201 3071 ALEJANDRINO AVE  
GUAYNABO, PR 00969-4800

INES GONZALEZ ROSADO  
PO BOX 775  
JUNCOS, PR 00777-0775

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

NOREEN WISCOVITCH RENTAS  
PO BOX 20438  
WEST PALM BEACH, FL 33416-0438

RAMON LEBRON OCASIO  
HC 40 BOX 47250  
SAN LORENZO, PR 00754-9907

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service  
Centralized Insolvency Operations  
O.O. Box 1126  
Cincinnati, PA 45999-0039

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Banco Popular de Puerto Rico	(d)CARLOS BELTRAN GONZALEZ SUNRISE AT PALMAS 95 MORNING DEW HUMACAO, PR 00791-6316	(d)CARLOS BELTRAN GONZALEZ SUNRISE AT PALMAS 95 MORNING DEW HUMACAO, PR 00791-6316
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End of Label Matrix	
Mailable recipients	58
Bypassed recipients	3
Total	61